

Exhibit C

Martin Monetti v. City of Seattle

and

Det. Shandy Cobane and Ofc. Mary Lynnee Woollum

Forensic Video Analysis

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Female Officer Movements (attached)

Foot Motion (attached)

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Analyst's Background

I attained an undergraduate degree in television broadcast communications in 1982 and have been continuously involved in the video and imaging industry for the last twenty-nine years.

I am a Certified Forensic Video Analyst with extensive experience in the recovery, scientific examination and evaluation of recorded video and audio information involving criminal and civil investigations in the United States, Canada and in the United Kingdom. I have been continuously active in this science since 1984.

As a Forensic Video Analyst, I have processed thousands of videotapes and computer discs containing digital multimedia evidence for both criminal and civil cases. I have been providing expert testimony as a Forensic Video Analyst since the early 1990's. In the past ten (10) years I have provided expert testimony in the field of Forensic Video Analysis more than eighty (80) times in US and Canadian courts at all levels. I have testified as an expert in Forensic Video Analysis in Washington State, Idaho, Oregon, California, Nevada, Colorado, Iowa, Missouri, Massachusetts, Pennsylvania, Michigan, Maine, New York, Texas, Florida, British Columbia, Alberta, Manitoba, the Yukon Territories, and in the Cayman Islands.

Since 1999, I have been the Principal Instructor for a series of Forensic Video Analysis courses offered by the Law Enforcement & Emergency Services Video Association (LEVA), a non-profit organization that has trained more than 2000 law enforcement video analysts from throughout the world.

I am the Team Leader for LEVA's Forensic Video Analysis Certification Program.

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I am the Digital Video Advisor to the International Association of Chiefs of Police for its In-Car Video Project and for its Regional Forensic Video Processing Lab Project, which is funded by the US Department of Justice.

I am also a member of the National Institute of Justice (NIJ) Special Technical Committee for Digital Interview Room Standards for law enforcement.

I am currently an adjunct instructor for the University of Indianapolis, and each year I teach approximately six (6) one week long courses for the University in various disciplines involved in the science of Forensic Video Analysis, including the use of advanced imaging technology. Students are serving video analysts primarily from police agencies in the US, Canada, the UK, Australia and Asia. Each of the courses focuses on digital video and analog video engineering principles and on the application of proper scientific methodologies for processing digital multimedia evidence, including scientific techniques used for Reverse Projection measurements and analysis, and for the accurate conversion of time-lapsed video into real-time video for synchronization of separately recorded video sources.

One of the courses that I teach at the University of Indianapolis is entitled Photographic/Video Comparisons, which focuses on the identification of vehicles, clothing and weapons captured to digital and analog video recording sources. I have taught this course in Canada at the British Columbia Institute of Technology and in Indianapolis for each of the last ten years. This course is accredited by the University of Indianapolis and by the Law Enforcement & Emergency Services Video Association, which recognizes the course in its Forensic Video Analysis Certification Program. I have also taught this course in the United Kingdom.

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A significant element of the Photographic/Video Comparison course material, and of the other courses I teach, involves the science of Reverse Projection. Reverse Projection is the scientific process of obtaining accurate measurements from photographic and video images. Reverse Projection has been used among imaging scientists, investigators, and in United States courts regularly for more than forty years as a tool to reproduce crime and accident scenes in order to conduct measurements and to make other accurate observations.

Each of the courses that I teach focuses on reflection of light, pixel tracking, digital compression technology, color measurement/analysis and on digital and analog artifact (error) identification for the sole purpose of ensuring the accurate interpretation of video evidence. Since each of the signal and digital components could impact the meaning of the images, the majority of testimony that I have provided includes a narrative explanation of the events captured to the video recording system.

I am a former Police Officer with the City of Vancouver Police Department in Canada. I was the head of the department's Forensic Video Unit from 1997 until 2000.

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Work Request

On January 20, 2012, our office received a contact from City of Seattle Attorney Ms. Dominique' Jinhong. Ms. Jinhong requested our assistance in the examination of video images relating to a complaint by Mr. Martin Monetti.

On July 6, 2010, our office was first contacted in relation to this case by Marilyn Brenneman of the King County Prosecutor's Office.

On July 12, 2010, I traveled to Seattle and met with Seattle Police Detective Robert Vallor. Together, Detective Vallor and I attended Seattle Television station Q13, and obtained an XDCam Media Card containing original video recordings.

On July 13, 2010, Mr. Larry Compton, of my office, performed a data recovery of the data from the Media Card.

Det. Vallor and Ms. Brenneman requested to know if the video content on the Media Card had been altered after it was originally recorded. An examination of the content on July 14, 2010 revealed that the content was original and was unaltered. No further work was requested at that time.

In 2012, Ms. Jinhong requested that I examine the contents of the video images, and provide a narrative description of the actions of two officers who were identified to me as Detective Cobane and Officer Woollum, in their contact with Mr. Monetti. Specifically, Ms. Jinhong requested to know if Det. Cobane's right foot came into contact with Mr. Monetti's head, and whether Officer Woollum's left leg came down on Monetti's lower back, buttocks, upper thigh area, or lower leg.

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Observations

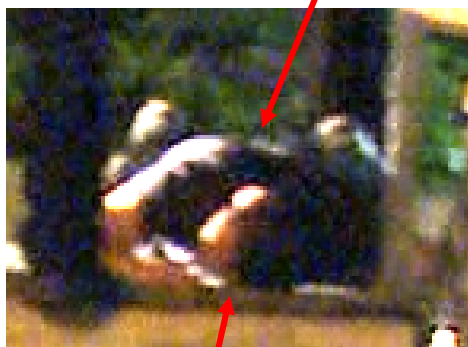
The video was recorded with a prosumer video camera to an XDCAM Media Card in digital form (MPEG4). Audio was recorded via an on-board microphone. The Media Card contained a total of seven minutes and twenty-nine seconds of content relating to this incident.

The media was imported into an Avid Forensic Video Analysis System for examination.



The images do not contain a date and time stamp. A frame counter number was produced during this analysis in order to track image references for the record.

Despite the lack of time and date stamp, the events clearly occurred at the same location and at the same time.



Monetti



Cobane

The first images show a group of officers standing around three males who are on the ground.

Mr. Monetti is seen at the center of the images.

Officer Cobane is seen at the right side of the images.

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Since the video was recorded at a frame rate of 60 images per second (59.94), the frame notation of 243 indicates that the image was recorded four seconds from the start of the recording.



Cobane is still standing at the rear of the white vehicle.

Monetti's head is slightly off of the ground. He is holding his right hand in front of his face, in a position consistent with looking at his hand.

Monetti then moves his hand to the area of the left side of his forehead and temple area.

An unknown officer who is standing over Monetti, reaches down with his left hand, and pulls Monetti's hand away from the front of his head and face area.

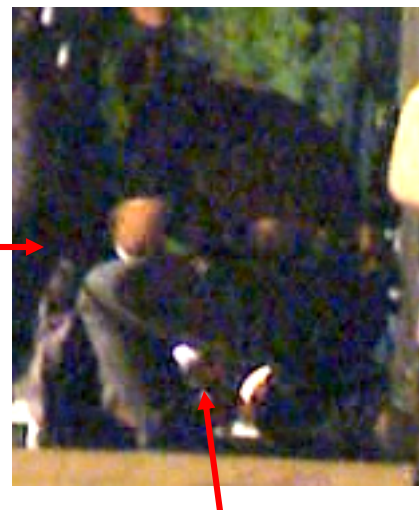


Officer's hand

Monetti's hand

Cobane is facing in the direction of Monetti's hand and head. Cobane begins to move toward Monetti ,immediately following the officer's movement of Monetti's hand.

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Monetti's hand

Cobane kneels in front of the male and can be heard talking loudly. Cobane was in this position for approximately twenty-five seconds of 'tape time'. The camera operator stopped recording for an unknown period of time, and changed positions. When the camera began recording again from a slightly different position, all parties were in the same approximate positions. It is likely that not more than a few seconds of real time elapsed.

I was not requested to comment on what the officer said to Monetti.

Cobane moves Monetti's hand away from his face, just as the other officer had done five seconds earlier.

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At the forty-nine second mark from the beginning of the recording (Image 2943), Monetti brings his right hand again to the left side of his head and temple area.

Monetti's head is off of the ground.

Monetti brings his hand to his forehead. He touches the left side of his temple, and covers the top of his face with his hand.



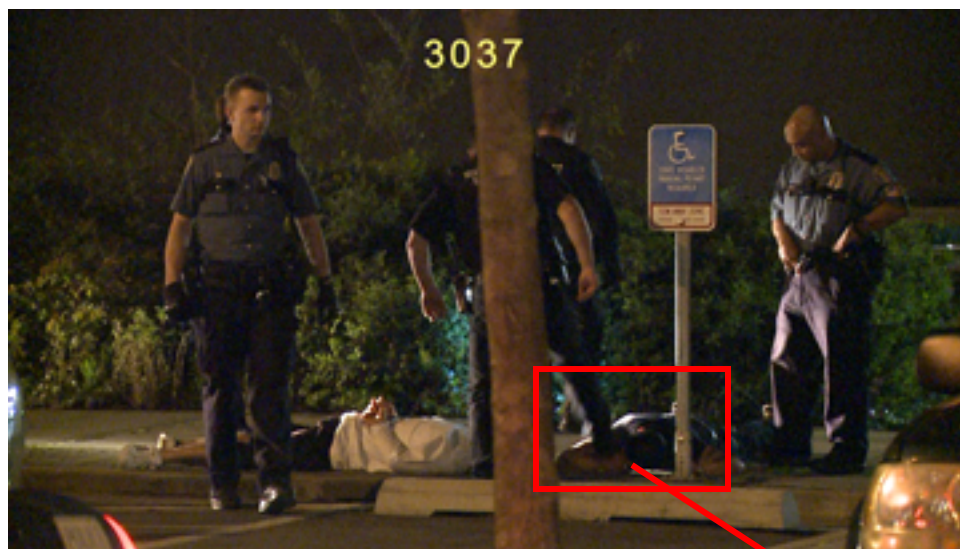
At Image 3032, Cobane lifts his right foot in the air, and moves it toward Monetti.

Cobane's right foot



Note that Monetti's right ear is visible, lit by an ambient light that is located outside of the field of view of the camera to the left.

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At Image 3037, Cobane's foot has moved downward.

The heel of Cobane's foot comes into contact with Monetti's hand. The fingers are compressed downward.

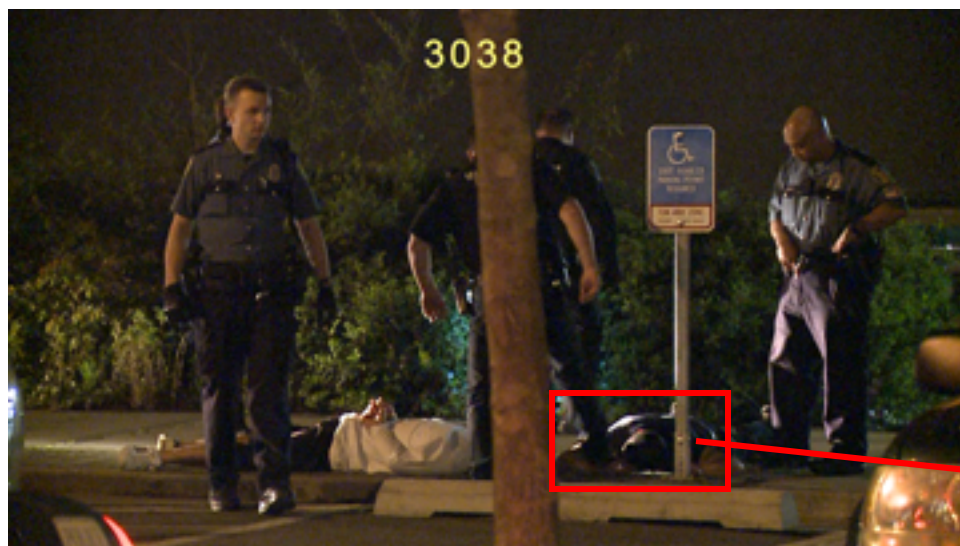
Cobane's foot does not contact Monetti's head.

As Cobane's foot moves downward, a space is visible between his foot and Monetti's head. The light source is still visible at Monetti's ear. The position of his ear remains constant from Image 3032, demonstrating no contact.



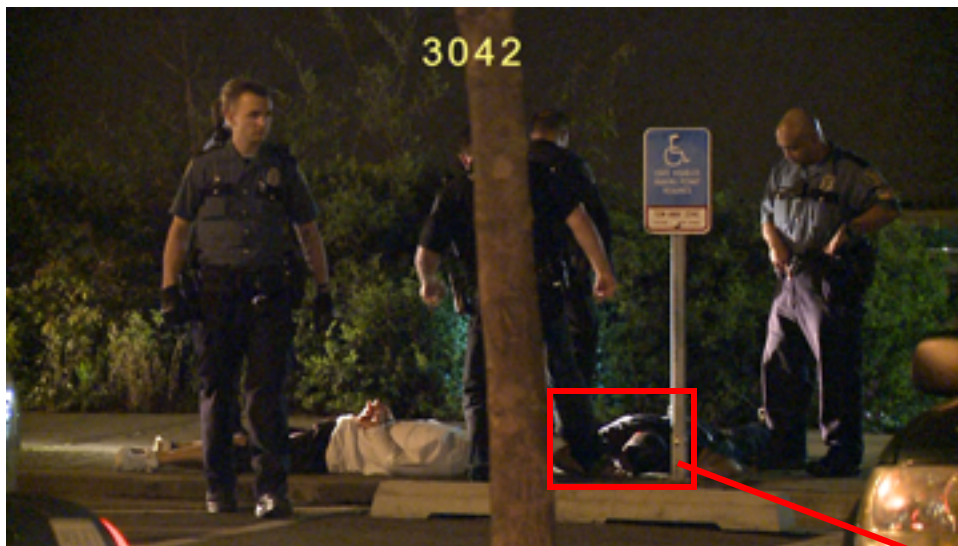
Cobane's right foot

At Image 3038, Cobane's foot continues to move downward. Monetti's hand is further compressed under Cobane's heel. There is clear space between Cobane's foot and Monetti's head. Monetti's head has not moved.



Space between foot and head

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At Image 3042, Cobane has compressed Monetti's hand onto the sidewalk, and begins to pull Monetti's hand away from his head.

Cobane's foot is clearly moving away from Monetti's head. Monetti's head has not moved position.



Monetti's hand

Cobane leaves his foot on top of Monetti's hand for twenty seconds.

While Monetti's hand is controlled by Cobane, Monetti lifts his right leg off the ground two times.

Monetti's right leg



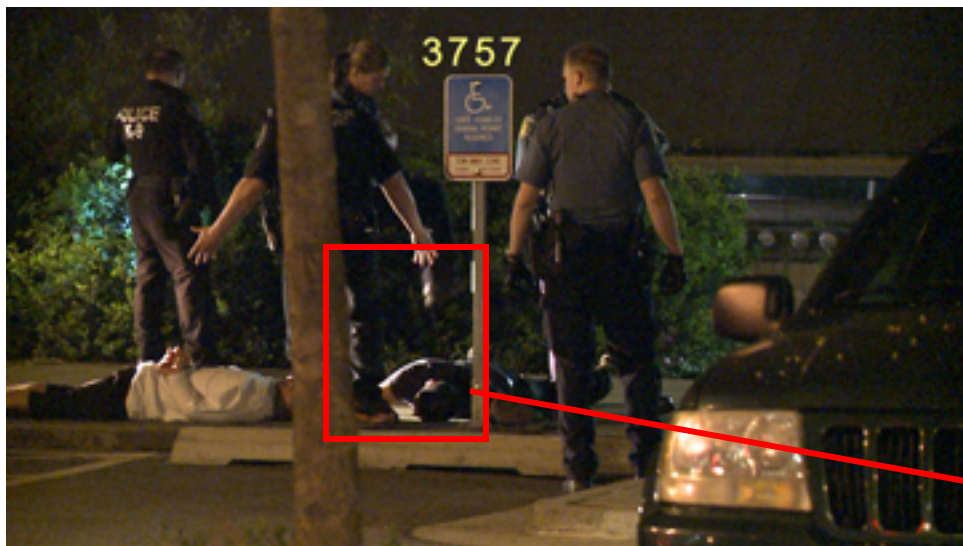
Woollum



While Monetti moves his foot up and down, Officer Woollum is looking downward toward Monetti.

Monetti's hand under Cobane's foot

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At 3757, after Monetti has raised his leg twice, Woollum moves toward him and raises her left leg in the air.



Woollum's left foot

Monetti's right heel



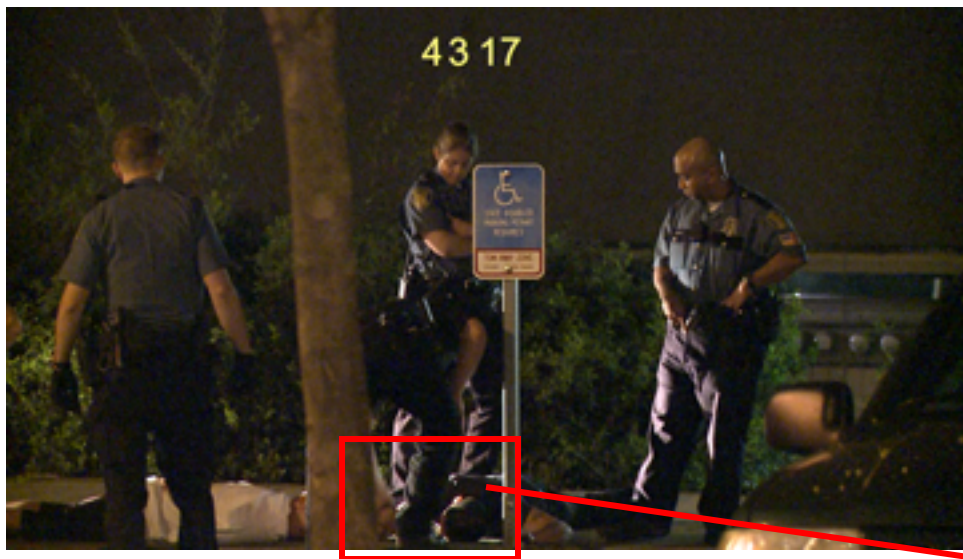
At 3773, Woollum brings her foot down onto the back of Monetti's lower leg. Monetti's buttocks can be seen in the image. His buttocks do not move as Woollum's left leg moves downward past the sight-plane of his back. However, his right heel moves downward as Woollum applies the downward force to his lower leg.

Monetti's right heel is no longer visible



Woollum's foot remains on Monetti's lower leg for twenty-three seconds.

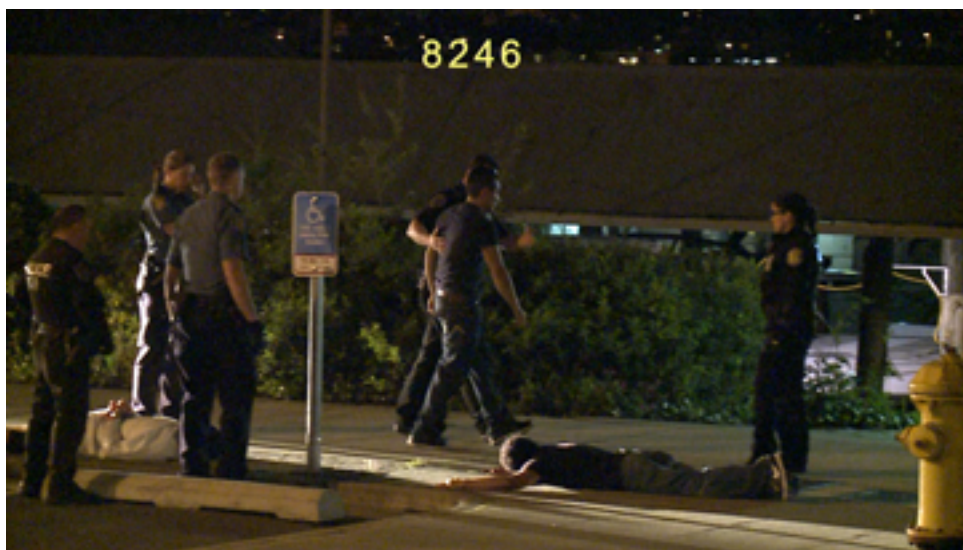
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At 4317, Cobane has removed his foot from Monetti's hand. Cobane picks up Monetti's hand, and again moves it away from Monetti's face.

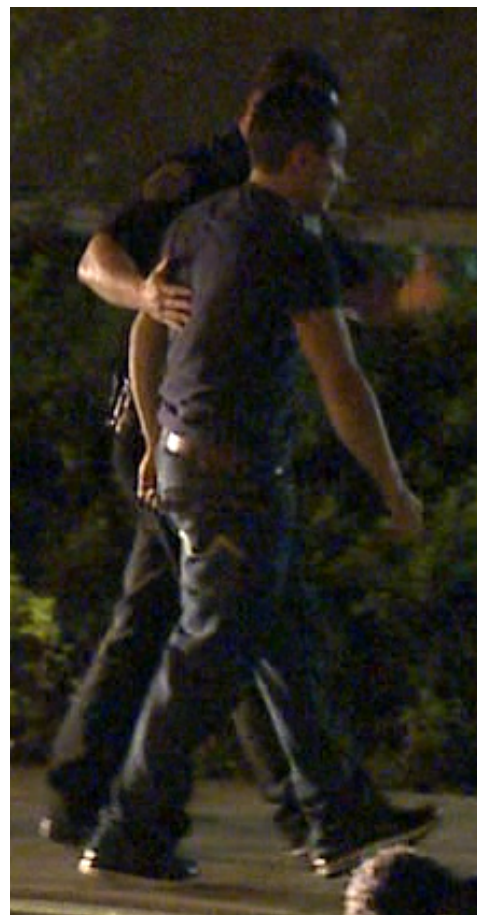


**Cobane picks up
Monetti's hand**



One minute and five seconds after moving Monetti's hand, Cobane assists Monetti off the ground, and escorts him away from the other males.

The video shows that Cobane, in company of another officer, is talking with Monetti for a period of time.



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At the end of the video, the camera operator conducts a brief interview with Monetti.

Monetti has an abrasion to his left temple area.

There are no injuries visible to any other part of his head that would be consistent with a contact with Cobane's foot.



The area of the injury is at the same position of Monetti's head, where Monetti was seen touching his head at images 243 and 3032.

See attached PDF Images ***Female Officer Movements***, for an image by image examination of the movements of Officer Woollum as described in this report.

See attached PDF Images ***Foot Motion***, for an image by image examination of the movements of Officer Cobane as described in this report.


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Opinion

A careful examination of the images shows that Det. Cobane's foot did not contact Monetti's head. There is evidence in the video that Monetti was touching the area of the injury, and then looking toward his hand, prior to Cobane's contact.

A careful examination of the images detailing the contact between Officer Woollum and Monetti shows that Woollum's left leg came down onto Monetti's lower leg. There is no support to suggest that her foot contacted Monetti's back, buttocks or thigh area.

Dated this 24th day of April, 2012 in Spokane, Washington.



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